

USDC SDNY

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March 11, 2022

**Via ECF**

The Honorable Analisa Torres, U.S.D.J.  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**RE: Victor Lopez vs. Movado Group, Inc.**  
**U.S. District Court, S.D.N.Y., Civ. Action No.: 1:21-cv-10700-AT**

Dear Honorable Analisa Torres:

I represent Defendant Movado Group, Inc. (“Defendant”) in the above-referenced matter. I write pursuant to Section 1 (B) of Your Honor’s Individual Rules of Practice in Civil Cases to request a 30-day extension of time to April 18, 2022, for Defendant’s Response to Plaintiffs’ Complaint in the matter. The original date to respond to the complaint was January 19, 2022. It was agreed between Parties that the response date be extended to February 18, 2022, which was granted on January 20, 2022 (Docket No.: 11). Thereafter, Parties agreed to a second extension, which was granted on February 16, 2022 (Docket No.:13). This is Movado Group, Inc.’s third request for an extension to respond to the initial complaint.

Additionally, Defendant Movado Group, Inc. requests an extension to submit a joint letter and a jointly proposed case management plan and scheduling order to April 18, 2022, in accordance with Rule 16 of the Federal Rules of Civil Procedure. The original due date to submit the joint letter and a jointly proposed case management plan and scheduling order was February 18, 2022. It was agreed between parties that the due date of the joint letter and a jointly proposed case management plan and scheduling order be extended to March 18, 2022, which was granted by the court January 20, 2022 (Docket No.:11). The is Movado Group, Inc.’s second extension to submit a joint letter and a jointly proposed case management plan and scheduling order.

We have met and conferred with Plaintiffs’ counsel, and they consent to our request for an extension of time to respond to the Complaint, and an extension to submit a joint letter and a jointly proposed case management plan and scheduling order in this matter. Good cause exists for this extension as counsel for Plaintiff and Defendant have been extensively discussing a possible settlement in this case. Counsel wish to further explore settlement in this action and believe that the additional time to investigate this matter and engage in further settlement

discussions that will be afforded by the requested extension of time to respond to the Complaint will reduce fees and costs, and will facilitate and increase the chances of early settlement of this matter. The requested extensions do not affect any other scheduled dates.

Respectfully submitted,

By: /s/ Deyuan Lin  
Deyuan Lin

CC: Michael A. LaBollita (via ECF)

GRANTED.

SO ORDERED.

Dated: March 15, 2022  
New York, New York



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ANALISA TORRES  
United States District Judge